

United States Bankruptcy Court  
Eastern District of Virginia  
Alexandria Division

In re:

Champagne Services, LLC.

Case No. 16-11683-RGM

Debtor.

Chapter 11

Response to Application to Employ Counsel to the Debtor, Docket No. 14

The Debtor has filed an application to approve the employment of Thomas K. Plofchan, Jr., and Westlake Legal Group (“Applicant”) as counsel for the Debtor.

The verified statement discloses that the Applicant previously represented the Debtor in “various unrelated matters such as: **defense of warrant in debt, demand letters, and employment disputes.**” (emphasis in original)

The verified statement should also disclose the status of the prior litigation, dates when the representations occurred, and the amount of money paid for the respective “various unrelated matters.”

Additionally, if the Applicant and the Debtor have entered into a retainer agreement, the retainer agreement should be filed in accordance with full disclosure.

Judy A. Robbins  
United States Trustee

/s/ Jack Frankel  
Jack Frankel, Attorney  
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